Bell Atlantic 1300 I Street NW, Suite 400W Washington, DC 20005 Susanne Guyer Executive Director, Federal Regulatory Affairs





March 17, 1998

Ex Parte

Ms. Magalie Roman Salas Secretary Federal Communications Commission 1919 M Street, NW Room 222 Washington, DC 20554

Re: <u>CC Dockets 97-121, 97-137, 97-208, 97-231</u>

Dear Ms. Salas:

Yesterday, Ms. J. Canny, Mr. J. Ward, Mr. M. Glover, Ms. D. May, Mr. A. Trinchese, Ms. L. Vial and I, representing Bell Atlantic, met with Mr. M. Riordan, the FCC's Chief Economist, and Ms. L. Choi, Ms. R. Karmarkar, Ms. W. Lader, Mr. J. Jennings, Mr. B. Olson, Mr. M. Kende and Ms. J. Fabian of the Policy and Program Planning Division of the Common Carrier Bureau. This meeting was held pursuant to a Public Notice issued by the Commission on January 27, 1998.

The Bell Atlantic representatives reviewed Bell Atlantic - New York's performance measurements and planned Track A showing. The attached materials were used as a basis for discussion during the meeting.

Sincerely,

Enclosure

cc: M. Riordan

L. Choi

R. Karmarkar

Ollsanne Alle

W. Lader

J. Jennings

B. Olson

M. Kende

J. Fabian

STATE OF NEW YORK DEPARTMENT OF PUBLIC SERVICE

January 15, 1998

N. VI 2529

TO:

All Parties

FROM:

Kevin Schwenzfeier

SUBJECT: Case 97-C-0271 -- Results of Competitive Analysis

The results contained in the following analyses have been aggregated so as to protect company-specific information.

Please note that the information provided by the responding carriers was not always presented in a consistent or complete manner. In addition, the only carriers responding were those present at the Technical Conference held in December. Therefore, the analyses do not represent a precise picture of the competitive landscape throughout New York, but provide a reasonable estimate of the competitive activities of the responding carriers.

If you have any questions concerning the summaries, I can be reached at (518) 486-2814.

ACCESS LINES (1)

	NY Metro	Upstate	Total	NY Metro	Upstate	Total
CLEC I Res Bus Tot	Facilities-Based 3,438 142,476 145,914	0 8,659 8,659	3,438 151,135 154,573	2.45 97.65	0.0% 100.0%	2.28 97.88
CLEC F Res Bus Tot	13,866 45,759 59,625	2,053 19,743 21,796	15,919 65,502 81,421	23.3% 76.7%	9.48 90.68	19.63 80.43
CLEC E Res Bus Tot	7B + Resale 17,304 188,235 205,539	2,053 28,402 30,455	19,357 216,637 235,994	8.4% 91.6%	6.7% 93.3%	8.28 91.88
NIT Res Bus Tot	5,148,590 2,995,644 8,144,234	1,980,331 756,588 2,738,919	7,128,921 3,754,232 10,883,153	63.28 36.88	72.38 27.78	65.5% 34.5%

	CLEC	MARKET .	SHARE
Residential	0.3%	0.15	0.3%
Business	5.9%	3.6%	5.5%
Total	2.5%	1.18	2.18

Note: Results based upon information provided by 15 CLECs.

(1) CLEC access lines as of 10/97. NYT access lines as of 12/31/96.

CLEC LOCAL SWITCH LOCATIONS AND CAPACITY

Location	# Switches	Capacity Access Lines
Upstate	6	43,953
NY Metro	24	289,080
Total	23	333,033

Note: Results based upon information provided by 9 facilities-based CLECs.

COMPETITIVE CHECKLIST ITEMS PURCHASED FROM NYT

		<u> </u>	<u> iii</u>	<u>iv</u>	<u>v</u>	<u>vi</u>	<u>vii</u>	<u>viii</u>	<u>ix</u>	<u>x</u>	<u>_xi</u>	<u>xii</u>	<u>xiii</u>	\underline{xiv}
Number of CLECs Purchasing Item:	7	. 2	2	4	.4	1	9	7	6	4	7	4	. 4	8

Note: Results based upon information provided by 15 CLECs.

Description of Checklist Items

- i Interconnection
- ii Nondiscriminatory access to network elements
- iii Nondiscriminatory access to poles, ducts, conduits, and rights-of-way
- iv Local loop transmission from the C.O. to the customer's premises, unbundled from switching or other services
 - v Local transport from the trunk side of a wireline LEC switch, unbundled from switching or other services
- vi Local switching unbundled from transport, local loop transmission, or other services
- vii Nondiscriminatory access to (1) 911 and E911 services; (2) DA services; (3) Operator call completion services
- viii White pages directory listings
 - ix Nondiscriminatory access to telephone numbers
 - x Nondiscriminatory access to databases and associated signaling for call routing and completion
 - xi Interim number portability through remote call forwarding, DID trunks, or other comparable arrangements
 - xii Nondiscriminatory access to such services or information to allow local dialing parity
- xiii Reciprocal compensation arrangements
 - xiv Telecommunications services are available for resale

OSS Performance

Pre-Ordering:

Average Response Time:	NY PSC 271 FILING	FCC/BA Merger	DOJ Suggestions
Customer Service Record	X	X	X
Other Pre-Ordering	X	X	
Due Date Availability			X
Address Validation			X
Product and Service Availability			X
Telephone Number Availability and Reservation			X
OSS Interface Availability:	X	X	X

Billing:

	NY PSC 271 FILING	FCC/BA Merger	DOJ Suggestions
% DUF in 3 Business Days	X	X	X
% DUF in 4 Business Days	X	X	X
% DUF in 5 Business Days	X	Х	X
% DUF in 8 Business Days	X	X	X
Timeliness of Carrier Bill	X	X	X
Billing Accuracy (% Usage Records Returned)			X

Other CLEC Services

Other

		NY PSC 271 FILING	FCC/BA Merger	DOJ Suggestions
•	Operator Services Speed of Answer ²			X
	Directory Assistance Speed of Answer ²			X
•	Resale Center - Speed of Answer (Ordering)			X
•	Resale Center - Speed of Answer (Repair)			X
•	UNE Center - Speed of Answer (Ordering)			X
•	UNE Center - Speed of Answer (Repair)			X
•	E911 Accuracy			X
•	Order Accuracy			X

1

separately reported

While Address Validation can be completed on a stand alone basis, TN reservation is always combined with Address Validation Performance for Aggregate NY to be reported. If traffic is handled by a separate center for CLECs, that performance will be

Resale

ALL ORDERS:	NY PSC 271 FILING	FCC/BA Merger	DOJ Suggestions
• % Flow Through	Χ	X	Χ
• % Rejects	X	X	X
Completion Notification – Avg. Response Time		X	X
Completion Notification – % On Time	λ		1
POTS SERVICES:			
Mechanized Orders:			
Average Order Confirmation Response Time	X	X	X
Average Reject Response Time	X	X	X
Non-Mechanized Orders < 10 Lines:			
Average Order Confirmation Response Time	X	λ	X
Average Reject Response Time	λ	X	X
Non-Mechanized Orders ≥ 10 Lines:			
Avg. Order Confirmation Response Time	X	X	X
Average Reject Response Time		X	<u>X</u>
SPECIAL SERVICES:			
Mechanized Orders:			
Average Order Confirmation Response Time		X	X
Average Reject Response Time		X	X
Non-Mechanized Orders < 10 Lines:			
Avg. Order Confirmation Response Time – Total	X 3	X	X
Average Reject Response Time	X	X	X
Non-Mechanized Orders ≥ 10 Lines:			
Avg. Order Confirmation Response Time		X	X
Average Reject Response Time		X	X

Provisioning:

POTS SERVICES:	NY PSC 271 FILING	FCC/BA Merger	DOJ Suggestions
Orders without Dispatch			
Average Interval Offered – Total	X	X	X
Average Interval Completed - Total	X	Χ	X
Missed Appointment - BA	X	X	X
Orders with Dispatch			
Average Interval Offered - Total		X	
Average Interval Offered (1 - 5 Lines)	X	X	X
Average Interval Offered (6 - 9 Lines)	X	X	X
 Average Interval Offered (≥ 10 Lines) 	X	X	- X
Average Interval Completed - Total		X	
Average Interval Completed (1 - 5 Lines) - Total	X	X	X
 Average Interval Completed (1 - 5 Lines) – RES. 			X
Average Interval Completed (1 - 5 Lines) -BUS.			X
 Avg. Interval Completed (6 - 9 lines -Dispatch) 	X	X	X
Average Interval Compl. (≥ 10 Lines - Dispatch)	X	X	X
Missed Appointment - BA	X	X	X
All Orders			
Number of orders	X		
Number of inward lines	X		
 % Completed within 5 Days (1 - 5 Lines) 	X	X	X
% Missed Appointment – Facilities	X	X	X
 Number of Facility Misses Delayed > 30 Days 			X
Average Delay Days – Facility Miss			X
Installation Troubles within 30 Days	X	X	X

 $^{^{\}rm 3}$ Includes both mechanized and non-mechanized - all line sizes

Resale

SPECIAL SERVICES:	NY PSC 271 FILING	FCC/BA Merger	DOJ Suggestions
Orders without Dispatch			
Average interval Offered - Total		X	X
Average Interval Completed - Total		X	X
Missed Appointment - BA - No Dispatch		X	X
Orders with Dispatch			
Average Interval Offered - Total		X	X
Average Interval Completed – Total		X	<u>X</u>
Missed Appointment - BA - Dispatch		X	X
All Orders			
Number of orders	X		
Number of inward Circuits	X		
Average Interval Offered – Total	X		
Average Interval Completed – Total	Χ		
Missed Appointment - BA - Total	X	X	X
Missed Appointment – Facilities	X	X	X
Number of Facility Misses Delayed > 30 Days			X
Average Delay Days - Facility Miss			X
Installation Troubles within 30 Days	X	Х	X

Maintenance:

POTS SERVICES:	NY PSC 271 FILING	FCC/BA Merger	DOJ Suggestions
Number of Troubles reported	X		
Network Trouble Report Rate	X	X	X
Nerwork Trouble Report Rate - Loop	X		X
Network Trouble Report Rate - Central Office	X		X
Missed Repair Appointments - Loop	X	X	X
Missed Repair Appointments - CO	X	X	X
Mean Time to Repair -TOTAL	X	X	
Mean Time to Repair - Loop Trouble			X
Mean Time to Repair - CO Trouble			X
 % OOS > 24 Hours – Loop Trouble 	X		X
 % OOS > 24 Hours – CO Trouble 	X		X
• % OOS > 24 Hours - Total	X	X	
• % Repeat Reports within 30 days	X	X	X

SPECIAL SERVICES:			
Number of Troubles reported	X		
Network Trouble Report Rate	X	X	X
Mean Time to Repair – Run Clock	X		
Mean Time to Repair - Stop Clock	X	X	X
• % OOS > 24 Hours	X	X	Х
Repeat Reports within 30 days	X	X	X

Unbundled Network Elements

Ordering:			
ALL ORDERS:	NY PSC 271 FILING	FCC/BA Merger	DOJ Suggestions
• % Flow Through:	X	X	X
Rejects	X	X	X
Completion Notification – Avg. Response Time		Х	λ
Completion Notification - % On Time	X		
POTS SERVICES:			
Mechanized Orders:	- NOTE -		
Average Order Confirmation Response Time	X	Χ	X
Average Reject Response Time	λ	X	λ
Non-Mechanized Orders < 10 Lines:			
Average OC Response Time - DCAS			λ
Average OC Response Time – Fax Orders			X
Average OC Response Time - Total	X	X	
Average Reject Response Time	X	X	X
Non-Mechanized Orders ≥ 10 Lines:			
Avg. Order Confirmation Response Time	X	X	λ
Average Reject Response Time	X	X	X
SPECIAL SERVICES:			
Mechanized Orders:			
Average Order Confirmation Response Time		Х	X
Average Reject Response Time		Χ	X
Non-Mechanized Orders < 10 Lines:			
Avg. Order Confirmation Response Time	X	X	λ
Average Reject Response Time	X	X	<u>X</u>
Non-Mechanized Orders ≥ 10 Lines:			
Avg. Order Confirmation Response Time		X	X
Average Reject Response Time		<u> </u>	<u> </u>

Provisioning:

POTS UNEs	NY PSC 271 FILING 4	FCC/BA Merger	DOJ Suggestions
Orders without Dispatch			
Average Interval Offered - Total		X	X
Average Interval Completed – Total		X	X
% Missed Appointment - BA	X	X	X
Orders with Dispatch			
Average Interval Offered - Total		X	
 Average Interval Offered (1 - 5 Lines) 	X	X	X
Average Interval Offered (6 - 9 Lines)	X	X	X
 Average Interval Offered (≥ 10 Lines) 	X	X	X
Average Interval Completed – Total		X	
 Avg. Interval Completed (1 - 5 Lines - Dispatch) 	X	X	X
 Avg. Interval Completed (6 - 9 lines -Dispatch) 	X	X	X
 Avg. Interval Completed (≥ 10 Lines - Dispatch) 	X	X	X
Missed Appointment - BA	X	X	X
All Orders			
Number of orders	X		
Number of inward lines	X		
• % Completed within 5 Days (1 - 5 Lines)	X	X	X
	X	X	X
 Number of Facility Misses Delayed > 30 Days 			X
Average Delay Days - Facility Miss			X
 % Installation Troubles within 30 Days 	X	X	X

⁴ Reported for UNE Loop and UNE Other

Unbundled Network Elements

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SPECIALS UNEs	NY PSC 271 FILING	FCC/BA Merger	DOJ Suggestions
Orders without Dispatch			
Average Interval Offered		χ	X
Average Interval Completed		X	X
Missed Appointment - BA - No Dispatch		X	X
Orders with Dispatch			
Average Interval Offered - Total - Dispatch		X	X
Average Interval Completed - Total Dispatch		Χ	X
Missed Appointment - BA - Dispatch		Χ	X
All Orders			
Number of orders	X		
Number of inward lines	X		
Average Interval Offered	X		
Average Interval Completed	X		
Missed Appointment - BA - Total	X	X	
Missed Appointment - Facilities	X	Х	X
Number of Facility Misses Delayed > 30 Days			X
Average Delay Days – Facility Miss			X
% Installation Troubles within 30 Days	X	X	X

Maintenance:

POTS UNEs:	NY PSC 271 FILING	FCC/BA Merger	DOJ Suggestions
Number of Troubles reported	X		
Network Trouble Report Rate - Loop	X	X	X
Network Trouble Report Rate - Central Office	X	X	X
Missed Repair Appoint Dispatched (Loop)	X	X	X
Missed Repair Appoint - Not Dispatched (CO)	X	X	X
Mean Time to Repair -Total	X	X	
Mean Time to Repair - Loop Trouble			X
Mean Time to Repair - CO Trouble			X
• % OOS > 24 Hours - Loop Trouble	X		
• % OOS > 24 Hours – CO Trouble	X		
•	X	X	X
Repeat Reports within 30 days	X	X	X

SPECIALS UNES	NY PSC 271 FILING	FCC/BA Merger	DOJ Suggestions
Number of Troubles reported	X		<u> </u>
Network Trouble Report Rate	X	X	X
Mean Time to Repair - Run Clock	X		
Mean Time to Repair – Stop Clock	X	X	X
• % OOS > 24 Hours	X	X	X
Repeat Reports within 30 days	X	X	X

Interconnection Trunks

-	Ordering:		
- 1	Of uering.	 	

ALL ORDERS:	NY PSC 271 FILING	FCC/BA Merger	DOJ Suggestions
Average Order Confirmation Response Time	X	X	X
% Firm Order Confirmations > 10 Business Davs		X	X
Average Reject Response Time	X	X	X
% Rejects > 10 Business Days		X	X
% Rejects	X	X	X
Completion Notification - Avg. Response Time		X	X
Completion Notification - % On Time	X		

Provisioning:

Interconnection Trunks	NY PSC 271 FILING	FCC/BA Merger	DOJ Suggestions
Number of orders	X		
Number of inward lines	X		
Average Interval Offered - Total	X	X	X
Average Interval Completed - Total	X	X	X
% Missed Appointment - BA - Total	X	X	X
% Missed Appointment - Facilities	X	X	X
Number of Facility Misses Delayed > 30 Days			X
Average Delay Days – Facility Miss			X
% Installation Troubles within 30 Days	X	X	X

Maintenance:

	NY PSC 271 FILING	FCC/BA Merger	DOJ Suggestions
Total Number of Troubles Reported	X		
Network Trouble Report Rate	X	X	X
Mean Time to Repair	X	X	X
• % OOS > 24 Hours	X	X	X
% Repeat Reports within 30 days	X	X	X

Network Performance:

Interconnection Trunks	NY PSC 271 FILING	FCC/BA Merger	DOJ Suggestions
• % Final Trunk Groups exceeding blocking design standard	X	X	X
# final trunk groups exceeding blockage standard			X
Total number of final trunk groups			X

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Measurement Definitions:

Data sources are subject to change as systems are integrated between the North and South states as Bell Atlantic moves to a standard operating environment. All systems may not necessarily move to a standard operating environment. The decision and timing of any changes are subject to change. Any changes in sources of data will be noted in future filings.

Pre-Ordering:

NOTE: All Pre-Ordering measurements are reported on an aggregated basis and are not available on a CLEC specific basis. Where the same OSS is used in multiple state jurisdictions, the same performance will be reported for each of those states.

<u>Metric 1 - Response Time OSS Interface</u>: Two Measures of OSS Response Time will be reported. "Response time" is defined as time (in seconds) that elapses from the submission of a query request to the receipt of a response by the requesting carrier (at the access platform for CLECs and directly to OSS for BA).

<u>Methodology</u>: Sample via simulation of Service Representatives' (both BA and CLEC) requests using Sentinel System. Ten Transactions per hour per transaction type, Monday - Friday 8 AM to 5 PM. Telephone number to be 1 transaction per hour due to potential impact on telephone number inventory.

- 1.01 Customer Service Record
- 1.02 Other Pre-Ordering: Includes average response time for the aggregate performance of (1) Due Date Availability, (2) Address Validation, (3) Product Service Availability (Feature Function) and (4) Telephone Number Availability.
- 1.11 Customer Service Record Aggregate CLEC
- 1.12 Other Pre-Ordering Aggregate CLEC Includes average response time for the aggregate CLEC performance of (1) Due Date Availability, (2) Address Validation, (3) Product Service Availability (Feature Function) and (4) Telephone Number Availability.

Status as of November 12:

North States:

TN Availability: Telephone number availability and reservation data are presently excluded due to the difficulty of ensuring that telephone numbers actually reserved in simulation are returned to inventory. However, the same OSS is used for Address Validation which is included in the performance results.

South States:

Sampling for Due Date Availability and Feature Function Availability under development. Measurement for BA retail service representatives under development.

Metric 2 - OSS Interface Availability: One measure of OSS Interface availability will be reported

2.01 OSS Interface Availability: "System availability" measures the hours during which the Carrier Interface (DCAS in the North, ECG in the South) is actually available as a percentage of scheduled availability. Bell Atlantic service representatives and CLEC service representatives obtain pre-ordering information from the same underlying OSS. As a result, if a particular OSS is down, it is equally unavailable to Bell Atlantic employees and to CLEC employees. Any difference in availability, therefore, will be caused by unavailability of the interface.

Status as of November 12:

North States:

DCAS currently has scheduled downtime. This downtime will be eliminated in December at which time a mechanized measure of unscheduled downtime will be available. The measure will be reported in the first quarter 1998 report scheduled to be published in May. Current scheduled DCAS downtime is limited to out of business hours from 3 AM - 4 AM Monday through Friday and from 3 AM - 5:30 AM on Saturday.

South States:

This performance measure is available for south states.

Ordering:

Metric 3 - Order Confirmation Timeliness: Fourteen Performance measures will be reported.

For Resale and Unbundled Network Elements:

<u>Average Response Time:</u> The amount of elapsed time (**in hours**) between receipt of a valid order request and distribution of a service order confirmation. Orders that are rejected will have the clock re-started upon receipt of a valid order.

Non-Mechanized (Manual Orders): Orders received that are not processed directly into the legacy provisioning systems. These orders must be manually entered by a BA representative into the BA Service Order Processor (SOP) system.

 \geq 10 lines: In some geographic areas, a facility check is completed on orders greater than

5 lines. In all geographic areas, orders with 10 or greater lines require a facility check prior to order confirmation and due date commitment.

<u>Mechanized (Flow-Through Orders)</u>: These orders are received electronically through the ordering interface and require no manual intervention to be entered into the SOP.

- 3.01 Resale POTS: Avg. Order Confirmation Response Time Non-Mechanized (Manual) < 10 lines
- 3.02 Resale POTS: Avg. Order Confirmation Response Time Non-Mechanized (Manual) \geq 10 lines
- 3.03 Resale POTS: Avg. Order Confirmation Response Time Mechanized (Flow-Through)
- 3.04 Resale Specials: Avg. Order Confirmation Response Time Non-Mechanized (Manual) < 10 lines
- 3.05 Resale Specials: Avg. Order Confirmation Response Time Non-Mechanized (Manual) \geq 10 lines
- 3.06 Resale Specials: Avg. Order Confirmation Response Time Mechanized (Flow-Through)
- 3.07 UNE POTS: Avg. Order Confirmation Response Time Non-Mechanized (Manual) < 10 lines
- 3.08 UNE POTS: Avg. Order Confirmation Response Time Non-Mechanized (Manual) ≥ 10 lines
- 3.09 UNE POTS: Avg. Order Confirmation Response Time Mechanized (Flow-Through)
- 3.10 UNE Specials: Avg. Order Confirmation Response Time Non-Mechanized (Manual) < 10 lines
- 3.11 UNE Specials: Avg. Order Confirmation Response Time Non-Mechanized (Manual) \geq 10 lines
- 3.12 UNE Specials: Avg. Order Confirmation Response Time Mechanized (Flow-Through)

Status as of November 12:

North States:

Resale performance for manual orders is based on a manual sampling methodology. Data is sampled from two data centers. One center provides New York data. The other center provides data for all New England States and the same data will be reported for Massachusetts, Maine, New Hampshire. Rhode Island and Vermont. In September 200 orders were randomly sampled for each sample. Fourth quarter performance will be based on a 400 order sample per month. Significant system development is required in the DCAS interface to produce results in a mechanized fashion on a carrier specific basis. This mechanization is expected for first quarter 1998 performance results. UNE performance is currently captured in a manual process with 100% sampling. Carrier specific performance is currently not available. Consistent with retail practices, for orders received after 3 PM EST, the next business day is considered the application date.

South States:

Currently based on a manual process, mechanization of these metrics is under development. Consistent with retail practices, for orders received after 12 PM EST the next business day is considered the application date.

For Interconnection Trunks:

- 3.13 Average Firm Order Confirmation Response Time: The amount of elapsed time (in days) between receipt of a <u>valid</u> ASR (Access Service Request) and distribution of a service order confirmation. Orders that are rejected will have the clock restarted upon receipt of a valid order.
- 3.14 % Firm Order Confirmations > 10 Days: The percent of Firm Order Confirmations confirmed more than 10 days after receipt of a valid ASR.

Status as of November 12:

North States:

For interconnection trunks, for orders where existing facilities are not available, measurement of this interval begins when facilities become available. Interconnection FOC performance is currently captured on a mechanized basis via the SAFE system.

South States:

Interconnection FOC performance is captured on a mechanized basis via the EXACT system.

<u>Metric 4 - Reject Notice Timeliness</u>: Fourteen Performance measures will be reported.

For Resale and Unbundled Network Elements:

Average Response Time: The amount of elapsed time (in hours) between receipt of an

order request and distribution of a reject. Same mechanized/non-mechanized definitions as Order Confirmation timeliness.

Resale - POTS: Avg. Reject Response Time Mechanized (Flow-Through) 4.01 Resale - POTS: Avg. Reject Response Time Non-Mechanized (Manual) < 10 lines 4.02 Resale - POTS: Avg. Reject Response Time Non-Mechanized (Manual) > 10 lines 4.03 Resale - Specials: Avg. Reject Response Time Mechanized (Flow-Through) 4.04 Resale - Specials: Avg. Reject Response Time Non-Mechanized (Manual) < 10 lines 4.05 Resale - Specials: Avg. Reject Response Time Non-Mechanized (Manual) > 10 lines 4.06 **UNE - POTS:** Avg. Reject Response Time Mechanized (Flow-Through) 4.07 UNE - POTS: Avg. Reject Response Time Non-Mechanized (Manual) < 10 lines 4.08 4.09 UNE - POTS: Avg. Reject Response Time Non-Mechanized (Manual) \geq 10 lines **UNE - Specials: Avg. Reject Response Time Mechanized (Flow-Through)** 4.10 4.11 UNE - Specials: Avg. Reject Response Time Non-Mechanized (Manual) < 10 lines

For Interconnection Trunks:

4.12

4.13 Average Reject Response Time: The amount of elapsed time (in days) between receipt of an ASR (Access Service Request) and distribution of a reject notice.

UNE - Specials: Avg. Reject Response Time Non-Mechanized (Manual) > 10 lines

4.14 % Rejects > 10 Days: The percent of Rejects sent more than 10 days after receipt of an ASR.

Status as of November 12:

North States:

Resale performance for manual orders is based on a manual sampling methodology. In September 150 orders were randomly sampled. Fourth quarter performance will be based on a 200 order sample per month. Significant system development is required in the DCAS interface to produce results in a mechanized fashion on a carrier specific basis. This mechanization is expected for first quarter 1998 performance results. UNE performance is currently captured in a manual process with 100% sampling.

Interconnection trunk performance data is captured from the SAFE system.

South States:

Resale and UNE performance for both manual and mechanized orders is captured from the LSR Manager system. Interconnection trunk performance data is captured in a mechanized fashion from the EXACT system.

<u>Metric 5 - % Rejects</u>: Three performance measures will be reported. This measure is defined as the **Percent of orders** received by Bell Atlantic that are rejected or queried to the CLEC due to CLEC error or omission.

5.01 % Rejects: Resale

5.02 % Rejects: Unbundled Network Elements

5.03 % Rejects: Interconnection Trunks

Status as of November 12:

North States:

For Resale and Unbundled Network Elements this measure is manually tracked for non-mechanized orders. Mechanized tracking for Flow-Through orders. For interconnection trunks, this performance is a mechanized measure.

South States:

Resale and UNE performance data for both manual and mechanized orders will be collected from the LSR Manager system. Interconnection trunk performance data will be collected from the EXACT system.

<u>Metric 6 - Timeliness of Completion Notification</u>: Three performance measures will be reported. This measure is defined as the average response time (**in days**) from the billing service order system completion date to the distribution of the order completion notification.

6.01 Average Response Time - Completion Notification: Resale

6.02 Average Response Time - Completion Notification: Unbundled Network Elements

6.03 Average Response Time - Completion Notification: Interconnection Trunks

Status as of November 12:

Bell Atlantic Region:

This performance metric is currently under development.

North States:

Completion notifications for Resale orders received via EIF or WEB/GUI are delivered mechanically via DCAS. For resale orders received via EDI and all new UNEs, completion notice is faxed to CLECs. For Hot cut loops or coordinated loop cut-overs, CLEC technicians accept the line at completion. Some, but not all, CLECs provide a serial number at close out for verification for loops. For interconnection trunks, CLEC technicians accept the trunks at completion. Some, but not all, CLECs provide a serial number at close out for verification for trunks.

South States:

Resale and UNE performance data for both manual and mechanized orders will be collected from the LSR Manager system. Interconnection trunk performance data will be collected from the EXACT system.

Metric 7 - % Flow Through Orders: Two performance measures will be reported. The number of orders processed through DCAS or ECG directly to Legacy provisioning OSS without manual intervention as a percentage of total orders. Flow-Through measurements are reported on an aggregated basis and are not available on a CLEC specific basis. Where the same Ordering System and Ordering Interface is used in multiple state jurisdictions, the same performance results will be reported for each of those states.

- 7.01 % Flow Through: Resale
- 7.02 % Flow Through: Unbundled Network Elements

Provisioning:

Metric 8 - Average Offered Interval: Thirty-two performance measures will be reported for North States. The South States will report nine measures due to different operational approaches to retail intervals. This measure is defined as the average number of business days between customer application date and committed due date. The application date is the date that a valid service request is received. The definition of application date is the same as Metric 3 - Order Confirmation Timeliness. Orders are grouped by volume of lines for POTS services and reported separately. Includes "X" and "W" coded orders. (North States) "X" orders are commitment where customer requests due date outside of offered interval. "W" orders are those for which the customer accepts an interval that is less than or equal to the standard/clock appointment interval. (South States) "W" orders are those for which the customer accepts an interval that is equal to the standard/clock appointment interval.

For Bell Atlantic Retail, Resale and Unbundled Network Elements:

<u>Total - No Dispatch</u>: All orders that require NO dispatch outside of a Bell Atlantic Central Office. This includes orders that require switch translation and/or central office dispatch for wiring work. Line size is not broken out.

<u>Dispatch</u>: An order requiring the dispatch of a Bell Atlantic Field technician outside of a Bell Atlantic Central Office. Intervals differ by line size. In all areas, for orders greater than or equal to 10 lines, a facility check is required and the interval negotiated. In many, but not all areas, a facility check is also performed for orders with 6 to 9 lines. (South States) No line size break out is available.

North States Reporting:

8.01	Bell Atlantic Retail - POTS: Average Interval Offered - Total - No Dispatch
8.02	Bell Atlantic Retail - POTS: Average Interval Offered - Total - Dispatch
8.03	Bell Atlantic Retail - POTS: Average Interval Offered - Dispatch (1 - 5 Lines)
8.04	Bell Atlantic Retail - POTS: Average Interval Offered - Dispatch (6 - 9 Lines)
8.05	Bell Atlantic Retail - POTS: Average Interval Offered - Dispatch (≥ 10 Lines)
8.06	Bell Atlantic Retail - Specials: Average Interval Offered - Total No Dispatch
8.07	Bell Atlantic Retail - Specials: Average Interval Offered - Total Dispatch
8.08	Bell Atlantic Retail - Specials: Average Interval Offered - Dispatch (1 - 5 Lines)
8.09	Bell Atlantic Retail - Specials: Average Interval Offered - Dispatch (6 - 9 Lines)
8.10	Bell Atlantic Retail - Specials: Average Interval Offered - Dispatch (≥ 10 Lines)
8.11	Resale - POTS: Average Interval Offered - Total - No Dispatch
8.12	Resale - POTS: Average Interval Offered - Total - Dispatch
8.13	Resale - POTS: Average Interval Offered - Dispatch (1 - 5 Lines)
8.14	Resale - POTS: Average Interval Offered - Dispatch (6 - 9 Lines)
8.15	Resale - POTS: Average Interval Offered - Dispatch (≥ 10 Lines)
8.16	Resale - Specials: Average Interval Offered - Total No Dispatch
8.17	Resale - Specials: Average Interval Offered - Total Dispatch

Resale - Specials: Average Interval Offered - Dispatch (1 - 5 Lines) 8.18 8.19 Resale - Specials: Average Interval Offered - Dispatch (6 - 9 Lines) **Resale - Specials: Average Interval Offered - Dispatch (≥ 10 Lines)** 8.20 UNE - POTS: Average Interval Offered - Total - No Dispatch 8.21 **UNE - POTS:** Average Interval Offered - Total - Dispatch 8.22 8.23 **UNE - POTS:** Average Interval Offered - Dispatch (1 - 5 Lines) 8.24 **UNE - POTS:** Average Interval Offered - Dispatch (6 - 9 Lines) **UNE - POTS:** Average Interval Offered - Dispatch (≥ 10 Lines) 8.25 8.26 **UNE - Specials: Average Interval Offered - Total No Dispatch** 8.27 **UNE - Specials: Average Interval Offered - Total Dispatch** 8.28 **UNE - Specials: Average Interval Offered - Dispatch (1 - 5 Lines)** 8.29 **UNE - Specials: Average Interval Offered - Dispatch (6 - 9 Lines)** 8.30 **UNE - Specials: Average Interval Offered - Dispatch (> 10 Lines) South States Reporting:** 8.01 Bell Atlantic Retail - POTS: Average Interval Offered - Total - No Dispatch 8.02 Bell Atlantic Retail - POTS: Average Interval Offered - Total - Dispatch 8.07 Bell Atlantic Retail - Specials: Average Interval Offered - Total 8.11 Resale - POTS: Average Interval Offered - Total - No Dispatch 8.12 Resale - POTS: Average Interval Offered - Total - Dispatch 8.17 Resale - Specials: Average Interval Offered - Total 8.21 **UNE - POTS:** Average Interval Offered - Total - No Dispatch **UNE - POTS: Average Interval Offered - Total - Dispatch**

8.27 UNE - Specials: Average Interval Offered - Total

Status as of November 12:

North States:

Retail, Resale and UNE performance captured on a mechanized basis from the same database.

South States:

Retail performance is captured in a mechanized fashion from the billing system. Resale and UNE are currently tracked manually. For Resale POTS, the source used for the manual collection methodology did not include the indication of Customer Requested Due Dates beyond the offered interval ("X" appointment codes), therefore, all orders with greater than 15 day intervals were excluded. Includes all orders placed in the calendar month, regardless of completion status. Mechanization of Resale and UNE performance data is expected in December 1997.

For Interconnection Trunks:

- 8.31 Bell Atlantic Retail Interconnection Trunks: Average Interval Offered Total
- 8.32 CLEC Interconnection Trunks: Average Interval Offered Total

Status as of November 12:

North States:

For interconnection trunks, where existing facilities are not available, measurement of this interval begins the date that a valid service request is received. Interconnection order interval performance is captured on a mechanized basis and measured on a Purchase Order Number (PON) basis.

South States:

For interconnection trunks, retail (FG D) and Interconnection trunk data is captured on a mechanized basis. However, there is no ability to exclude intervals where the customer (CLEC) requests a longer interval ("X" appointment code).

Metric 9 - Average Completed Interval: This performance measure is the same as Metric 8 - Average Offered Interval (measured in average number of business days) with two key differences. The end point for the measure is actual completion date. Orders completed late due to a CLEC or CLEC end user caused delay are excluded from this performance measurement.

For Bell Atlantic Retail, Resale and Unbundled Network Elements:

North States Reporting:

9.01	Bell Atlantic Retail - POTS: Average Interval Completed - Total - No Dispatch
9.02	Bell Atlantic Retail - POTS: Average Interval Completed - Total - Dispatch
9.03	Bell Atlantic Retail - POTS: Average Interval Completed - Dispatch (1 - 5 Lines)
9.04	Bell Atlantic Retail - POTS: Average Interval Completed - Dispatch (6 - 9 Lines)
9.05	Bell Atlantic Retail - POTS: Average Interval Completed - Dispatch (≥ 10 Lines)
9.06	Bell Atlantic Retail - Specials: Average Interval Completed - Total No Dispatch
9.07	Bell Atlantic Retail - Specials: Average Interval Completed - Total Dispatch
9.08	Bell Atlantic Retail - Specials: Average Interval Completed - Dispatch (1 - 5 Lines)
9.09	Bell Atlantic Retail - Specials: Average Interval Completed - Dispatch (6 - 9 Lines)
9.10	Bell Atlantic Retail - Specials: Average Interval Completed - Dispatch (≥ 10 Lines)
9.11	Resale - POTS: Average Interval Completed - Total - No Dispatch
9.12	Resale - POTS: Average Interval Completed - Total - Dispatch
9.13	Resale - POTS: Average Interval Completed - Dispatch (1 - 5 Lines)
9.14	Resale - POTS: Average Interval Completed - Dispatch (6 - 9 Lines)
9.15	Resale - POTS: Average Interval Completed - Dispatch (≥ 10 Lines)
9.16	Resale - Specials: Average Interval Completed - Total No Dispatch
9.17	Resale - Specials: Average Interval Completed - Total Dispatch
9.18	Resale - Specials: Average Interval Completed - Dispatch (1 - 5 Lines)
9.19	Resale - Specials: Average Interval Completed - Dispatch (6 - 9 Lines)
9.20	Resale - Specials: Average Interval Completed - Dispatch (≥ 10 Lines)
9.21	UNE - POTS: Average Interval Completed - Total - No Dispatch

UNE - POTS: Average Interval Completed - Total - Dispatch 9.22 **UNE - POTS:** Average Interval Completed - Dispatch (1 - 5 Lines) 9.23 **UNE - POTS: Average Interval Completed - Dispatch (6 - 9 Lines)** 9.24 **UNE - POTS:** Average Interval Completed - Dispatch (> 10 Lines) 9.25 **UNE - Specials: Average Interval Completed - Total No Dispatch** 9.26 **UNE - Specials: Average Interval Completed - Total Dispatch** 9.27 **UNE - Specials: Average Interval Completed - Dispatch (1 - 5 Lines)** 9.28 **UNE - Specials: Average Interval Completed - Dispatch (6 - 9 Lines)** 9.29 **UNE - Specials: Average Interval Completed - Dispatch (≥ 10 Lines)** 9.30 **South States Reporting:** Bell Atlantic Retail - POTS: Average Interval Completed - Total - No Dispatch 9.01 Bell Atlantic Retail - POTS: Average Interval Completed - Total - Dispatch 9.02 Bell Atlantic Retail - Specials: Average Interval Completed - Total Dispatch 9.07 Resale - POTS: Average Interval Completed - Total - No Dispatch 9.11 9.12 Resale - POTS: Average Interval Completed - Total - Dispatch 9.17 Resale - Specials: Average Interval Completed - Total - Dispatch 9.21 **UNE - POTS:** Average Interval Completed - Total - No Dispatch **UNE - POTS:** Average Interval Completed - Total - Dispatch 9.22 9.27 **UNE - Specials: Average Interval Completed - Total - Dispatch** Status as of November 12:

Bell Atlantic Regional Issue:

Special services data reported as dispatch or no dispatch does not reflect use of technicians in central offices. All special services require CO dispatch. Intervals are not dependent on indication of outside dispatch, but are specific to the service offered.

North States:

Retail, Resale and UNE performance captured on a mechanized basis from the same database.

South States:

Retail performance is captured in a mechanized fashion from the billing system. Resale and UNE are currently tracked manually. For Resale POTS, the source used for the manual collection methodology did not include the indication of Customer Requested Due Dates beyond the offered interval ("X" appointment codes), therefore, all orders with greater than 15 day intervals were excluded. Mechanization of Resale and UNE performance data is expected in December 1997.

For Interconnection Trunks:

- 9.31 Bell Atlantic Retail Interconnection Trunks: Average Interval Completed Total
- 9.32 CLEC Interconnection Trunks: Average Interval Completed Total

Status as of November 12:

North States:

For interconnection trunks, where existing facilities are not available, measurement of this interval begins the date that a valid service request is received. Interconnection order interval performance is captured on a mechanized basis and measured on a Purchase Order Number (PON) basis.

South States:

For interconnection trunks, Retail (FG D) and Interconnection trunk data is captured on a mechanized basis. However, there is no ability to exclude intervals where the customer (CLEC) requests a longer interval ("X" appointment code).

Metric 10 - % Completed within 5 Days: Three performance measures to be reported. Includes "W" coded orders only. ("W" is defined in Metric 8.) Orders completed late due to a CLEC or CLEC end user caused delay are excluded from this performance measurement. (North States) This measure reports only the percentage of POTS services with 5 or fewer lines per order.

- 10.01 Bell Atlantic Retail POTS: % Completed within 5 Days
- 10.02 Resale POTS: % Completed within 5 Days
- 10.03 UNE POTS: % Completed within 5 Days

Status as of November 12:

North States:

Retail, Resale and UNE performance captured on a mechanized basis from the same database.

South States:

Performance measure under development and expected in December.

Metric 11 - % Missed Appointment - BA: Eleven performance measures will be reported.

For Bell Atlantic Retail, Resale and Unbundled Network Elements: The percentage of <u>orders</u> completed for which there was a missed appointment caused by Bell Atlantic. Excludes missed appointments caused by CLEC or CLEC end user delays. Same definition of dispatch and no dispatch as previous measures.

- 11.01 Bell Atlantic Retail POTS: % Missed Appointment BA Dispatch
- 11.02 Bell Atlantic Retail POTS: % Missed Appointment BA No Dispatch
- 11.03 Bell Atlantic Retail Specials: % Missed Appointment BA Total
- 11.04 Resale POTS: % Missed Appointment BA Dispatch
- 11.05 Resale POTS: % Missed Appointment BA No Dispatch
- 11.06 Resale Specials: % Missed Appointment BA Total
- 11.07 UNE POTS: % Missed Appointment BA Dispatch
- 11.08 UNE POTS: % Missed Appointment BA No Dispatch
- 11.09 UNE Specials: % Missed Appointment BA Total

Status as of November 12:

North States:

Retail, Resale and UNE performance captured on a mechanized basis from the same database.

South States:

Retail performance captured on a mechanized basis. Resale and UNE tracked manually.

Mechanization of resale and UNE expected in December.

<u>For Interconnection Trunks:</u> The percentage of <u>trunks</u> (for north states) and <u>Orders</u> (for south states) completed for which there was a missed appointment caused by Bell Atlantic. Excludes missed appointments caused by CLEC or CLEC delays. Trunks are measured on an individual trunk basis.

11.10 Bell Atlantic Retail - Interconnection Trunks: % Missed Appointment - BA

11.11 CLEC - - Interconnection Trunks: % Missed Appointment - BA

Status as of November 12:

North States:

Modification of the mechanized system for capturing this data is under way.

South States:

Retail (FG D) and CLEC trunk performance data is captured on a mechanized basis.

Metric 12 - % Missed Appointment - Facilities: Eight performance measures will be reported. Percentage of all Orders for which there was a missed appointment due to lack of Bell Atlantic facilities.

For Bell Atlantic Retail, Resale and Unbundled Network Elements: Measures % of orders missed due to lack of outside plant facilities. All outside plant facility orders are dispatched.

- 12.01 Bell Atlantic Retail POTS: % Missed Appointment Facilities
- 12.02 Bell Atlantic Retail Specials: % Missed Appointment Facilities
- 12.03 Resale POTS: % Missed Appointment Facilities
- 12.04 Resale Specials: % Missed Appointment Facilities
- 12.05 UNE POTS: % Missed Appointment Facilities
- 12.06 UNE Specials: % Missed Appointment Facilities

Status as of November 12:

North States:

Retail, Resale and UNE performance captured on a mechanized basis from the same